

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**JACKIE WHITE,**

**Plaintiff,**

**v.**

**MPW INDUSTRIAL SERVICES, INC.,**

**Defendant.**

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**CASE NO. 1:06CV82-MHT-CSC**

**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO ANSWER**

Comes now the Defendant, MPW Industrial Services, Inc. ("MPW"), and moves this Court for an extension of time, from March 7, 2006 to March 21, 2006, in which to answer or otherwise plead in response to the Complaint. In support of the motion, MPW shows as follows:

1. On February 15, 2006, MPW was served with a copy of the Complaint.
2. MPW's responsive pleading is due on March 7, 2006.
3. The undersigned, MPW's counsel, was retained for this case only this week, and has been unable to make a meaningful investigation of the allegations. Such an investigation is necessary in order for MPW to properly respond to the Complaint and for the undersigned to fulfill his obligation in signing the response.
4. Consequently, MPW requests an additional two weeks, or until March 21, 2006, in order to allow its counsel to investigate the Complaint.
5. The undersigned counsel has not been able to obtain a phone or fax number for the Plaintiff, who is proceeding *pro se*. Accordingly, MPW's counsel does not know Plaintiff's position regarding this extension.

WHEREFORE, PREMISES CONSIDERED, MPW respectfully requests that it be granted additional time, through March 21, 2006, to answer or otherwise plead in response to the Complaint.

Respectfully submitted this 2<sup>nd</sup> day of March, 2006.

s/Dorman Walker  
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Attorney for Defendant,  
MPW Industrial Services, Inc.

**OF COUNSEL:**

Dorman Walker (WAL086)  
BALCH & BINGHAM LLP  
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Montgomery, AL 36101-0078  
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**CERTIFICATE OF SERVICE**

I certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing and/or that a copy of the foregoing has been served upon the following by United States Mail, properly addressed and postage prepaid to the following:

Jackie White, *Pro Se*  
721 Blair Avenue  
Hampton, Virginia 23661

This the 2<sup>nd</sup> day of March, 2006.

s/Dorman Walker  
Of Counsel